



Linda S. Adams
Secretary for
Environmental Protection

Air Resources Board

Mary D. Nichols, Chairman
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Arnold Schwarzenegger
Governor

April 17, 2008

Mr. Sean Hogan, Chief
United States Environmental Protection Agency
Region 9
Technical Support Office (AIR-7)
75 Hawthorne Street
San Francisco, California 94105

Dear Mr. Hogan:

I am writing to request that the July 4 and 5, 2007, San Joaquin Valley Air Pollution Control District PM_{2.5} exceedances at the Bakersfield and Fresno monitoring sites, be flagged as exceptional events due to emissions from fireworks. The United States Environmental Protection Agency (U.S. EPA) has determined that data impacted by emissions from culturally-significant fireworks displays can be flagged as exceptional events. Documentation on the event and its impact on air quality is enclosed.

Unusually high concentrations were documented at the Bakersfield and Fresno monitoring sites during a period of both civic and neighborhood fireworks activities. Hourly data from the Beta Attenuation Monitors at the sites, as well as speciation data from the Fresno site, indicated the exceedances were due to fireworks emissions with calm winds allowing the emissions to remain in the local areas. Without the fireworks activities and calm winds, the concentrations measured at Bakersfield and Fresno on July 4 and 5, 2007, would have been below the federal standard.

On March 22, 2007, the U.S. EPA adopted the 'Treatment of Data Influenced by Exceptional Events' rule that allows data to be flagged and thus excluded from consideration by U.S. EPA when making decisions related to the attainment status of an area. This rule, which became effective on May 22, 2007, requires that States submit documentation to support flagging to the appropriate U.S. EPA Regional Office.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

We are, therefore, formally requesting that you flag this exceedance as a PM2.5 exceptional event and send confirmation to us by letter after the data has been flagged. If you have any questions regarding the enclosed documentation, please contact Ms. Sylvia Zulawnick, Manager, Particulate Matter Analysis Section, at (916) 324-7163, or via email at szulawni@arb.ca.gov.

Sincerely,

Karen Magliano, Chief
Air Quality Data Branch
Planning and Technical Support Division

Enclosure

cc: Mr. Scott Nestor, Planning Director
San Joaquin Valley Air Pollution Control District
1990 East Gettysburg Avenue
Fresno, California 93726

Sylvia Zulawnick, Manager
Planning and Technical Support Division